

## Multi-layer labels with CLP and GHS



Here we collected some information  
for the use of multi-layers labels  
according to the CLP Regulation\*.

\* (Regulation (EC) no. 1272/2008 on classification, labeling and packaging of substances and mixtures)

# The guidelines

Multi-layer labels - both wet glue and self-adhesive roll - are used for labeling of hazardous substances according to GHS / CLP. This applies to coatings and aerosols.

In order to implement the CLP Regulation, the European Chemicals Agency ECHA has published guidelines. ECHA and some European Member States shall determine the CLP Regulation from so that the official language of the Member State in which the product is delivered, directly must be forward to read on the label. The use of multilayer Faltetiketten which contain the required information in several languages on multiple pages, is therefore questioned by the ECHA guidance.

## The practice

We believe that this interpretation of the (non-legally binding) ECHA Guidance does not match the contents of the CLP Regulation. From our experience and practice meet multi-layer labels (multilayer / wet glue labels) if the following recommendations are complied with the requirements of the CLP Regulation:

1. On the outside should in any case the product name - eg Rust remover - be visible in all languages.
2. GHS symbol and the signal word such as „Warning“ should be included in each case on the outside and the side which is firmly anchored on the container.
3. A note as “Other hazards can be found on the inside of the label.“ should in any case on the outside, to be visible in all languages.
4. If possible, the GHS symbols should be repeated on all interior sides of the label.
5. H und P phrases can then be placed on the inside pages.

# Best practice

Considering these instructions multi-layer labels currently used with GHS. One could also speak of a status of "Best Practice" here.

The paint association VDL on the website [www.lackindustrie.de](http://www.lackindustrie.de) a position paper published and uses this paper in the communication with the authorities in order to achieve a clarifying amendment to the ECHA Guidance.


Support, within its capabilities this position, you influence that these time-tested rules and compliant use of multilingual multi-layer labels will be maintained. The practice has long been a viable solution.

<b>DE</b> Rostlöser	Weitere Gefahrenhinweise finden Sie auf den Innenseiten des Etiketts
<b>GB</b> Rust Remover	Further risk information, see on the inner sides of the label
<b>FR</b> Dégrissant	De plus amples informations de risque, voir sur les côtés intérieurs de l'étiquette
<b>ES</b> Afloja-Todo	Más informaciones riesgo, consulte en los lados interiores de la etiqueta
<b>PT</b> Removedor de Ferrugem	Outras informações risco, consulte nos lados interiores da etiqueta
<b>NL</b> Roestoplosser	Verdere risico-informatie, zie aan de binnenzijde van het etiket
<b>NO</b> Rustløser	Ytterligere risikoinformasjon, se på de indre sider av etiketten
<b>DK</b> Rustopløser	Yderligere risi ko oplysninger i på indersiderne af etiketten
<b>SE</b> Rostlösare	Ytterligare information risk, se på de inre sidorna av etiketten
<b>FI</b> Ruosteentiroittaja	Lisätietoja etiketin toisella puolella
<b>IT</b> Rimuovipolvere	Per ulteriori informazioni relative ai rischi, vedere il lato interno dell'etichetta
<b>CZ</b> Uvoňovač rzi	Ostatní bezpečnostní informace najdete na vnitřní straně obalu
<b>HU</b> Rozszooldó	A további biztonsági kiegészítő információkat lásd a címke belső oldalán
<b>BG</b> Разтворител на ръжда	Подробни инструкции за безопасност ще намерете на вътрешните страници на етикета
<b>RU</b> Средство для удаления ржавчины	Подробные меры предосторожности Вы найдете на внутренней стороне этикетки
<b>EE</b> Rooste eemaldi	Täiendava tooteohutusinfo leiata etiketi siseküljelt
<b>LV</b> līdzeklis rūsas noņemšanai	Papildus informāciju par lietošanas riskiem lūdzam skatīt uzlīmes iekšpusē
<b>LT</b> Rūdžių tirpiklis	Išsamesnė pavojaus ir saugumo informacija rasite vidinėje etiketės pusėje
<b>RO</b> Solvent de rugina	Alte informatii de risc, a se vedea pe latunile interioare ale etichetei
<b>PL</b> Odrzewiacz	Pozostałe informacje dotyczące zagrożeń znajdują się na wewnętrznej stronie etykiety
<b>SRB</b> Sredstvo za skidanje rđe	Dodatne sigurnosne napomene možete naći sa unutrašnje strane etikete
<b>SK</b> Uvoňovač hrdze	Ďalšie bezpečnostné údaje nájdete na vnútornej strane etikety
<b>SI</b> Odstranjevalec rje	Nadaljnja navodila za uporabo, se nahajajo na notranji strani etikete

## Rostlöser

### Rust Remover

■ **wetterbeständig**
■ **sparsam im Verbrauch**



**DE Anwendungsgebiet:**  
Löst festgerostete Schrauben, Muttern, Maschineteile und verhindert neue Rostbildung. Temperaturbeständigkeit von -30 °C bis +50 °C.


**Verarbeitungshinweis:**  
Oberflächen besprühen, so dass eine gute Benetzung vorliegt. Vorgang eventuell mehrmals wiederholen. Einwirken lassen je nach Grad des Festsitzens oder erforderlicher Eindringtiefe. Leichte Schläge auf die entsprechenden Stellen erleichtern den Lösevorgang. Wenn notwendig, Behandlung wiederholen.

**Sicherheitshinweise:**  
**Gefahr.** Extrem entzündbares Aerosol. Behälter steht unter Druck: Kann bei Erwärmung bersten. Von Hitze/Funken/offener Flamme/heißen Oberflächen fernhalten. Nicht rauchen. Nicht gegen offene Flamme oder andere Zündquelle sprühen. Behälter steht unter Druck: Nicht durchstechen oder verbrennen, auch nicht nach der Verwendung. Vor Sonnenbestrahlung schützen und nicht Temperaturen von mehr als 50 °C aussetzen.

**Inhaltsstoffe:**  
Propan, n-Butan (<0.01% Butadien -1,3), Kohlenwasserstoffe, C10-C13, n-Alkane, iso-Alkanen, cyclischen, <2% Aromaten, Paraffinöl

**Gefahr**  
**Danger**  
**Danger**  
**Peligro**  
**Perigo**  
**Gevaar**  
**Fare**  
**Fara**  
**Vaara**  
**Pericolo**  
**Nebezpečí**


**Veszély**  
**Onačno**  
**Onačno**  
**Ettevaatus**  
**Draudi**  
**Demesio**  
**Pericol**  
**Niebezpieczeństwo**  
**Opasnost**  
**Nebezpečnostvo**  
**Nevarno**



Art.-Nr.  
9230 000 125

**Inhalt:**  
**400 ml**

**520** e3



4 025938 006814

9230 000 125/01/04/15

Bitte hier aufreissen! - Please pull here

# VdL Position Paper

## Interpretation of the ECHA guidance in terms of priority rules governing languages at multi-layer labels

Association of German  
Paint and printing ink industry e.V.



### Position Paper of the German paint and printing ink industry

#### Interpretation of the ECHA guidance regarding a priority on language arrangements multi-layer labels

The use of multilingual multi-layer labels in the paint and printing ink industry is long proven practices and regulations in conformity: the required information are all included and legibly. This existing procedure it was the users of with multi-layer labels equipped products very well so far possible to identify the hazardous material identification at a glance.

The CLP Regulation takes the issue with Article 29 explicitly:

Article 29 (1) of the CLP Regulation governs exemptions from labeling and packaging regulations and says that if a package designed / shaped / is so small, that it is not possible, the labeling requirements in the / the official language (s) of Member State where the substance or mixture is placed on the market, meet, then allowed the identification be carried out in accordance with Annex I, Section 1.5.1. It stipulates that the label elements in accordance with Art. 17 can be attached to fold or hang tags or on an outer packaging.

In Article 17 (1) the content of the label is controlled. Art. 17 (2) stipulates that this. More languages may be used, as required by the Member States, provided that the same information in all languages appear.

#### A scheme for arrangement of the languages on the multi-layer labels there in the above Not sites.

Some European Member States shall lay down a passage of the ECHA guidance for CLP Regulation out so that the official language / s of the Member State in which the product is delivered, must be directly read on the front label.

This way of the abovementioned provisions of the CLP Regulation beyond interpretation by the ECHA Guidance on labeling and packaging in accordance with Regulation (EC no. 1272/2008 provides the use of multilingual multi-layer labels in the previous frame in question.

The requirement that the official language / s of the Member State in which the product is delivered, must be directly read on the front of the label, represents a serious obstacle to the free movement of goods within the EU. It seems, however, that in recitals the CLP Regulation in the first paragraph (1) to ensure the free movement of goods by chemical substances, mixtures and articles as well as improving competitiveness and innovation are called. In order to ensure the free movement of goods, the exceptions set out in Article 29 and Annex I were defined. In Regulation itself gives no indication as to a priority language arrangements with regard to the design of multi-layer labels. The ECHA Guidance has only informative but not legally binding character. Using fold labels with several official European languages corresponds thus the provisions of the CLP Regulation and - if legible - even in the Guide statements made.

In addition, the use of multi-layer labels of the paint and printing ink industry practiced for many years practice. Such labels are primarily for use only, when the package size a legible representation of the usual identification information space technology does not allow. It was found in practice that the user compared to the usual labels have no noticeable restrictions in the information recording and assessment of the risk.

#### Follow the paint and printing ink industry

A loss of multi-layer labels or applying the guidelines ECHA would mean that for every Recipient country own label would have to be created. This will reproduce the manufacturing and logistics costs, necessary storage locations and storage costs. After we know today expect the companies concerned a significant overhead in these areas at least twice up to four times the financial, logistical and lagerbezogenem effort.

A marketing within the meaning of free movement of goods as well as an improvement in the Competitiveness and innovation are thus no longer given.

Against this background, the companies of the German paint and printing ink industry call for the retention of the previously very successful exploitation use and design of multi-layer labels. As used in the paint and printing ink industry multi-layer labels the labeling requirements under the old (DPD) as well as new (CLP) legal and comply are designed legible, is their use with several EU official languages, incl. of the to supplying local regulations compliant.

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